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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

April 11, 1995

CERTIFIED MAIL - P 189 977 828
RETURN RECEIPT REQUESTED

Mr. Joseph Haake
Group Manager
McDonnell-Douglas, St. Louis
Environmental and Hazardous
Materials Services
P.O. Box 516, Department 64C
Mail Code 1003377
St. Louis, MO 63166-0516

RE: Comment Letter on the RCRA Closure Activities, McDonnell-
Douglas Complex, St. Louis
EPA ID Number: MOD000818963

The following comments address the closure reports for the Building 52 site, tanks H12-H16 and tanks H19-H20, and the Building 14 wastewater treatment sludge holding tank. McDonnell-Douglas shall review these comments and respond to the Missouri Department of Natural Resources (MDNR) within thirty (30) days of receipt.

Comments

1. Boring H19-S-A shows high levels of arsenic, cadmium, and lead on the southern side of the H19-H20 storage pad. Not only are these levels above the background sample, but they are well above the regional levels listed in the United States Geological Survey publication Geochemical Survey of Missouri.

McDonnell-Douglas shall determine the rate and extent of these high contaminant levels in the soil. To accomplish this, MDNR recommends that samples of the soil be taken under the asphalt pad, to a greater depth at the point H19-S-A was taken, at the southeastern edge of the pad, and south/southwest of H19-S-A. After the extent of



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contamination has been determined, the contaminated soil shall be excavated and disposed of in an approved disposal facility.

2. Regarding the sludge holding tank, cyanide was detected in the samples taken next to and beneath the tank, particularly in sample ST 15-20. McDonnell-Douglas shall provide further evidence that the presence of cyanide is not indicative of a release from the tank. The MDNR recommends taking other background samples to demonstrate the uniform presence of cyanide in the soil. Due to the fact that ST 15-20 is significantly higher than the other two samples, McDonnell-Douglas should also check the quality control of sample ST 15-20 to make sure that it is indeed a valid sample.

If you have any questions regarding these comments, please call me at (314) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM



Brian McCurren
Environmental Engineer
Permits Section

BM:sw

c: Bob Stewart, P.E. U.S. EPA Region VII ✓
MDNR, St. Louis Regional Office